

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

KEVIN & KAREN SCHEUNEMANN,

CASE NO. 3:12-cv-00856

Plaintiffs,

vs.

Judge _____
Magistrate Judge _____

TRANS UNION LLC,

Defendant.

TRANS UNION, LLC’S MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Federal Rule of Civil Procedure 5.2(d), Defendant, Trans Union, LLC (“Trans Union”), by counsel, seeks leave to file under seal, in connection with Trans Union’s Notice of Removal, a Settlement Agreement And General Release which, by its express terms is confidential, notwithstanding the fact that Plaintiffs attached a copy of same to their Complaint filed in state court (the “Motion”).

In support of the Motion, Trans Union states as follows:

1. Plaintiffs Kevin and Karen Scheunemann served Trans Union on or about October 31, 2012, with a Summons and Complaint (“the “Complaint”) filed in the Circuit Court For Dane County, Wisconsin.
2. Plaintiffs attached to the Complaint a Settlement Agreement And General Release between Plaintiffs and Palisades Collection, LLC (“Palisades”), which, by its express terms, is confidential (the “Confidential Settlement Agreement”).

3. Counsel for Trans Union has spoken with Counsel for Palisades, which is not a party to this action, and Palisades has requested that the Confidential Settlement Agreement be filed under seal.

WHEREFORE, Trans Union respectfully requests that the Court grant it leave, in connection with its filing of its Notice of Removal, to file under seal the Confidential Settlement Agreement, which Plaintiffs attached to their Complaint filed in state court.

Dated: November 27, 2012

Respectfully submitted,

s/ Justin T. Walton

William R. Brown, Esq.

Justin T. Walton, Esq.

Schuckit & Associates, P.C.

4545 Northwestern Drive

Zionsville, IN 46077

Telephone: 317-363-2400

Fax: 317-363-2257

E-Mail: wbrown@schuckitlaw.com

jwalton@schuckitlaw.com

Counsel for Defendant, Trans Union, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **27th day of November 2012**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

None	
------	--

The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **27th day of November 2012**, properly addressed as follows:

<u>Pro Se Plaintiffs</u> Kevin and Karen Scheunemann 210 Dream Catcher Drive Kewaskum, WI 53040	
---	--

s/ Justin T. Walton

William R. Brown, Esq.

Justin T. Walton, Esq.

Schuckit & Associates, P.C.

4545 Northwestern Drive

Zionsville, IN 46077

Telephone: 317-363-2400

Fax: 317-363-2257

E-Mail: wbrown@schuckitlaw.com

jwalton@schuckitlaw.com

Counsel for Defendant, Trans Union, LLC